REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the notice that claims 14, 15, 25, 28 and 29 would be allowable if rewritten to overcome the rejections under 35 U.S.C. §101. Applicants have amended the claims accordingly and as such, Applicants respectfully request notice of allowance of these claims.

Claims 1-11, 13-15, 19 and 23-30 stand rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter. Applicants respectfully point out that there appears to be an error in the rejection since claims 23-25 are not method claims but instead are directed to a graphics processing engine having the claimed structure. Accordingly, it appears that these claims were inadvertently included in the rejection. As to the remaining method claims, Applicants have amended the claims although Applicants do not believe that they needed to be amended, to indicate that the method for hierarchical Z buffering and stenciling is carried out by a graphics processing engine.

Claims 1-11, 13, 19, 23, 24, 26, 27 and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Aila et al in view of Greene et al. Applicants thank the Examiner for the additional clarification in the rejection. However, Applicants respectfully submit that the amended claims are not taught or suggested by the cited references. As a preliminary matter, the office action alleges that the term "tile" is "considered to read on either a single or plurality of pixels" (page 4 of office action). However, Applicants respectfully submit for example, that the claim cannot be interpreted as such since the claim requires "a plurality of pixels within the tile" (see for example, last clause of claim 1, first clause of claim 8, etc.). Applicants have amended

9

claim 1 to include inherent language that a tile is comprised of a plurality of pixels. Since the interpretation was incorrect, the rejection should be withdrawn.

Also, the office action alleges that the single pixel depth element 512 is considered to read on a tile. Applicants respectfully note that the claim requires a tile that has a plurality of pixels and as such, this rejection is overcome. As such, the claims are in condition for allowance.

In addition, the office action alleges that "updating" in the claim is interpreted to mean the same as "accessed". Applicants respectfully submit that the office action does not provide any dictionary definition or any information in the Specification which supports this improper interpretation. As known in the art, updating includes modifying or changing and as such, the claim requires modifying the hierarchical Z value range and the stencil code in response to the claimed comparison of the tile Z value range of a tile with a hierarchical Z value range and a stencil code. As such, the claim is also in condition for allowance for this reason alone.

In addition, the office action states that there is no indication of what is meant by "stencil code". Applicants have amended the claim to indicate that the stencil code specifies at least (can specify more) whether stencil values in a tile are equal to, less than or greater than a background stencil value upon which the tile is being compared (see for example, FIGs. 7, 8 and 9 of Applicants' Specification). No such comparing of such a stencil code with a hierarchical Z value range and a tile Z value range of a tile as claimed is set forth in the references. As such, Applicants respectfully submit that the claims are in condition for allowance.

As to claim 8, Applicants respectfully reassert the relevant remarks made above. In addition, the claim indicates that the stencil code is a multiple bit indicator that specifies a relation of all stencil values in the tile relative to a background value. (See for example, FIG. 7).

10

Again, no such stencil code or updating of a stencil code appears to be employed in the cited portions of the references. Accordingly, the claim is in condition for allowance.

The other independent claims include stencil code information as noted and as such, these claims are also in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

Applicants respectfully submit that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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